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Attorneys for Defendants
TRAVIS MOREDA DAIRY and TRAVIS
MOREDA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER
MOORE IN SUPPORT OF
STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES SET BY
COURT (L.R. 6-1, 6-2)**

*[Filed concurrently with Stipulated
Request]*

*Assigned for all purposes to the
Honorable Susan Illston*

DECLARATION OF ALEXANDER MOORE

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice law in the State of California. I represent Travis Moreda and Travis Moreda Dairy (collectively, “TMD”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, and if called as a witness I could and would competently testify thereto.

2. On November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to the Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11).

3. On January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15).

4. On January 22, 2025, Plaintiff Californians for Alternatives to Toxics (“CATs,” and collectively with TMD, the “Parties”) and TMD met and conferred pursuant to Federal Rule of Civil Procedure 26(f).

5. Also on January 22, 2025, the Parties each timely filed the ADR Certification.

6. The Parties have engaged in settlement discussions, and CATs is preparing a settlement proposal for TMD’s review.

7. The Parties have each committed to a good-faith effort to resolve this case within 60 days to conserve the expenditure of attorneys’ fees and costs in litigation, and therefore the Parties agree to seek a 60-day extension to all deadlines currently set by Court order.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 27th day of January 2025, in Oakland, California.

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6 Alexander Moore
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